ADVERSARY PROCEEDING COVER SHI (Instructions on Reverse)	ADVERSARY PROCEEDING NUMBER (Court Use Only)
PLAINTIFFS Russel P. Blust Sr.	DEFENDANTS Wells Fargo, Specialized. Loan Servicing LLC, and US E National Associates as Trustee for Bear Stearns Asset B Securities Trust 2004 C-3
ATTORNEYS (Firm Name, Address, and Telephone No.)	ATTORNEYS (If Known) FILED
Pro Se	Harrisburg, PA
PARTY (Check One Box Only)	PARTY (Check One Box Only) 11.10 am
■ Debtor □ U.S. Trustee/Bankruptcy Admin	□ Debtor □ U.S. Trustee/BankAuptey 5drau21
□ Creditor □ Other	☑ Creditor □ Other
□ Trustee	□ Trustee
an inspector to the property who came in contact with my tenants during my bankruptcy stapped minossible to collect rent or even a fraction of the rent. Monthly statements are still be tage mailing address (It is the address the mortgage is on, but the mailing address on it into none of which are accurate. I suffered a stroke in 2017 that was caused due to Afilitorney with no results so I am now filing this PRO SE. I am seeking rental loss, punitive S.C §362 and multiple Bankruptcy Protection Violations.	ISE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED) the credit violations and violations of the Battle Company of the Company
	E OF SUIT as 1, first alternative cause as 2, second alternative cause as 3, etc.)
FRBP 7001(1) – Recovery of Money/Property  11-Recovery of money/property - §542 turnover of property	FRBP 7001(6) – Dischargeability (continued)
12-Recovery of money/property - §547 preference	61-Dischargeability - §523(a)(5), domestic support  1 68-Dischargeability - §523(a)(6), willful and malicious injury
13-Recovery of money/property - §548 fraudulent transfer	63-Dischargeability - §523(a)(b), willful and malicious injury
14-Recovery of money/property - other	63-Dischargeability - §523(a)(15), divorce or separation obligation
- 1. Hossier, of money, property - duter	(other than domestic support)
FRBP 7001(2) – Validity, Priority or Extent of Lien  21-Validity, priority or extent of lien or other interest in property	65-Dischargeability - other
== 27 valuely, priority of extent of field of other interest in property	FRBP 7001(7) – Injunctive Relief
FRBP 7001(3) - Approval of Sale of Property	71-Injunctive relief – imposition of stay
31-Approval of sale of property of estate and of a co-owner - §363(h)	72-Injunctive relief – other
FRBP 7001(4) - Objection/Revocation of Discharge	Charles and the Control of the Contr
41-Objection / revocation of discharge - §727(c),(d),(e)	FRBP 7001(8) Subordination of Claim or Interest  81-Subordination of claim or interest
FRBP 7001(5) - Revocation of Confirmation	
51-Revocation of confirmation	FRBP 7001(9) Declaratory Judgment 2 91-Declaratory judgment
FRBP 7001(6) – Dischargeability	EDDD 7001/10\ D. (
66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims	FRBP 7001(10) Determination of Removed Action
62-Dischargeability - §523(a)(2), false pretenses, false representation,	01-Determination of removed claim or cause
actual fraud  67. Dischargeability - 8523(a)(4) fraud as fiducion, ambardament la consultation of the cons	Other
67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny	SS-SIPA Case – 15 U.S.C. §§78aaa et.seq.
(continued next column)	3 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)
2 Check if this case involves a substantive issue of state law	☐ Check if this is asserted to be a class action under FRCP 23
Check if a jury trial is demanded in complaint	Demand \$ 70,000 in lost rent, \$100,000 in collection violation
Other Relief Sought	Lost wages, attorney fees, court cost, and whatever deems proper and justified.

BANKRUPTCY CASE IN WHICH	THIS ADVERSARY PROCEED	DING ARISES
NAME OF DEBTOR Russel P. Blust Sr.	BANKRUPTCY CASE N 15-BK-02826	IO.
DISTRICT IN WHICH CASE IS PENDING Middle District of Pennsylvania	DIVISION OFFICE Bankruptcy	NAME OF JUDGE Charles J. Dehart III
RELATED ADVERSA	ARY PROCEEDING (IF ANY)	
PLAINTIFF DEFEN Russel P. Blust Sr		ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING The Middle District of Pennsylvania	DIVISION OFFICE	NAME OF JUDGE
DATE	PRINT NAME OF ATTO	RNEY (OR PLAINTIFF)
January 05, 2021	Russel P. Blust	Sr

#### INSTRUCTIONS

The filing of a bankruptcy case creates an "estate" under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor's discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also must complete and file Form 1040, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court's Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 1040 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff's attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

Plaintiffs and Defendants. Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

Attorneys. Give the names and addresses of the attorneys, if known.

Party. Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

Demand. Enter the dollar amount being demanded in the complaint.

**Signature.** This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

## UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF PENNSYLVANIA - HARRISBURG DIVISION

RUSSEL P. BLUST, SR.

: NO: 15-BK-02826

**PLAINTIFF** 

: ADVERSARY COMPLAINT

WELLS FARGO, ET AL DEFENDANT

: PURSUANT TO 11 U.S.C. §§ 727(A) FILED Harrisburg, PA

11:10 am JAN - 5 2021 N

TO THE COURT AND ALL PARTIES IN INTEREST:

COMES NOW, the Plaintiff, Russel P. Blust, Sr., by and through himself, to file the installerk, US Bankruptcy Court adversarial complaint and in support thereof avers as follows:

- 1. This is a complaint claiming a creditor, creditor's servicing agent, or creditor's counsel violated the automatic stay, Debtor's confirmed Chapter 13 Plan, or the Fair Debt Collection Practices Act.
- 2. Numerous monthly statements in the same months with conflicting statement balances were sent to the wrong address according to all documents, and all documents pertaining to the chapter 13 bankruptcy filing or the plan approval.
- 3. Due to the numerous violations, it has been made almost impossible to collect a significant percentage of rent, due to the letters being sent there or the mortgage inspectors coming by the property and having contact with the tenants. Plaintiff is seeking rental loss, punitive damages, stress, and violation of privacy in violation of 11 U.S.C. § 362 - has been violated on a monthly basis and so has the Bankruptcy Consumer Protection Act from the time Wells Fargo took over. Wells Fargo filed. a Motion to Stay that was heard on January 28, 2020 and on February 25, 2020. The judges decision was against the Stay.
- 4. The Plaintiff is seeking compensatory and/or punitive damages based on the aforereferenced conduct as prescribed by law as well as any and all other applicable relief.

## JURISDICTION

- 5. This Court has jurisdiction of this adversary proceeding pursuant to 28 U.S.C. §118 (b)
- 6. This Court has jurisdiction pursuant to 28 U.S.C. §1331
- 7. This is a core proceeding under 28 U.S.C. 157(b) (2)

## VENUE

8. Venue is proper under 28 U.S.C. § 1409

## **PARTIES**

- PLAINTIFF Russel P. Blust is the Plaintiff in the instant matter with an address of 701
   Drexel Rd. Harrisburg, Pa 17109.
- 10. DEFENDANT Wells Fargo, Specialized Loan Servicing, L.L.C., and US Bank National Associates as Trustee for Bear Steams Asset Backed Securities Trust 2004 C-3, are the Defendants named in the instant matter all conducting business in the instant district.

## FACTUAL ALLEGATIONS

- 11. The Plaintiff alleges the Defendant willfully violated the automatic stay pursuant to 11 U.S.C. § 362. (a) when they continued to send statements with faulty or false payment history records of Debtor's loan account. Defendant sent multiple statements to the rental property to harass Plaintiff and the tenants in an attempt to collect a debt. As such, Debtor seeks a damage award under 11 U.S.C. § 362(k) for Defendant's willful violation. Please see *exhibit A* which will show that on multiple months multiple statements were sent and there is a substantial difference in every amount owed.
- 12. Among the various acts complained of are the mailing of statements and notices to an income producing property not listed on the Plaintiff's accounts or the approved Bankruptcy Plan, as

well inconsistencies in the amounts represented in statements thereby causing damages to the Plaintiff in the form of financial loss. *Exhibit A* 

- 13. The Plaintiff is able and willing to point to as much as \$70,000 in loss of rent, possibly more than \$100,000 in collection violations, lost wages, attorney fees, court costs, as well as other economic costs and considerations as a result of the conduct complained of in the instant matter.
- 14. Plaintiff also has a signed witness statement from at least one tenant during the time that all was taking place that specifically states that numerous mortgage inspectors were coming out to the property some even as far as having contact with the tenants. Please see *Exhibit B* attached.
- 15. There are several emails thats have been sent back and forth from the Plaintiff to the Autorney of Record about the inconsistencies, the trustee payments not being credited properly, or other violations that have arose.
- 16. Plaintiff reached out the Attorney of Record in July 2015 requesting a letter be given to him to provide to the tenants that stated that even though he was in bankruptcy the tenants were reauired to pay rent and continue to follow the lease agreements. This was requested because tenants had stopped paying rent due to the mortgage inspectors and the statements being sent. The letter was finally provided to the Plaintiff in October 2015. *Exhibit C*
- 17. In additon, numerous statements violated Bankruptcy rule 3002.1 all fees incurred during the Chapter 13 must be noticed (inspections, taxes, or whatever they added.)
- 18. Based on the aforementioned conduct, the Plaintiff avers that they are entitled to relief in the instant Court as prescribed by law.

## FIRST CAUSE OF ACTION

(For a Determination That Plaintiff's Debts Are Dischargeable Pursuant to 11 U.S.C. § 727 (a) (2) (B))

- 19. The Plaintiff hereby references and incorporates Paragraphs 1 through 18 as though full set forth herein at length.
- 20.. The Defendant engaged in numerous violations of bankruptcy rules and regulations referenced in the factual allegations thereby giving rise to the damages complained of.
- 21. As a result of the conduct complained of, the Plaintiff avers that they are entitled to the discharge of debts based on the aforementioned conduct in the amount of damages caused by the conduct complained of.
- 22. The Plaintiff is able and willing to point to as much as \$70,000 in loss of rent,possibly more than \$100,000 in collection/privacy violations, lost wages, attorney fees, court costs, as well as other economic costs and considerations as a result of the conduct complained of in the instant matter.
- 23. Based on the aforementioned conduct, the Plaintiff avers that they are entitled to relief in the instant Court as prescribed by law.

## PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for the entry of judgment against Defendant as follows:

- That the Court determine that the debts of Defendant be ruled dischargeable because
   Defendant, with intent to pursue their own interests and with reckless disregard of the
   rights and interests of the Plaintiff, engaged in the aforementioned conduct thereby
   violating the provisions of 11 U.S.C. § 362, BK rule 3002.1, Bankruptcy Protection Act,
   Fair Debt Collection Practices Act, BK Rule 524(i); and/or
- That the Court determine that the debts of the Plaintiff be ruled dischargeable because
  Defendant engaged in numerous acts in violation of provisions of 11 U.S.C. §
  727(a)(2)(B);
- For an award of attorney's fees as allowable by law in an amount of Court determines to be reasonable;
- 4. For costs of suit herein incurred; and
- 5. For such other and further relief as this Court deems just and proper

Dated: January 5, 2021

Respectfully Submitted,

# United States Bankruptcy Court MIDDLE District Of PENNSYLVANIA Case No. 15-BK-02826 In re Russel P. Blust Sr Debtor Chapter\_13 Russel P. Blust Sr Plaintiff V. Adv. Proc. No. Wells Fargo, Specialized Loan Services LLC., and U S Bank National Association as Trustee for Bear Stearns Asset Backed Securities Trust 2004-C3 Defendant ) SUMMONS IN AN ADVERSARY PROCEEDING YOU ARE SUMMONED and required to file a motion or answer to the complaint which is attached to this summons with the clerk of the bankruptcy court within 30 days after the date of issuance of this summons, except that the United States and its offices and agencies shall file a motion or answer to the complaint within 35 days. OFFICE OF THE CLERK UNITED STATES BANKRUPTCY COURT Address of the clerk: MIDDLE DISTRICT OF PENNSYLVANIA 228 WALNUT STREET, SUITE 320 HARRISBURG, PENNSYLVANIA 17101-1737 At the same time, you must also serve a copy of the motion or answer upon the plaintiff's attorney. Name and Address of Plaintiff's Attorney: Russel P. Blust Sr. -PRO-SE 701 Drexel Rd Harrisburg, Pa 17109 If you make a motion, your time to answer is governed by Fed. R. Bankr. P. 7012.

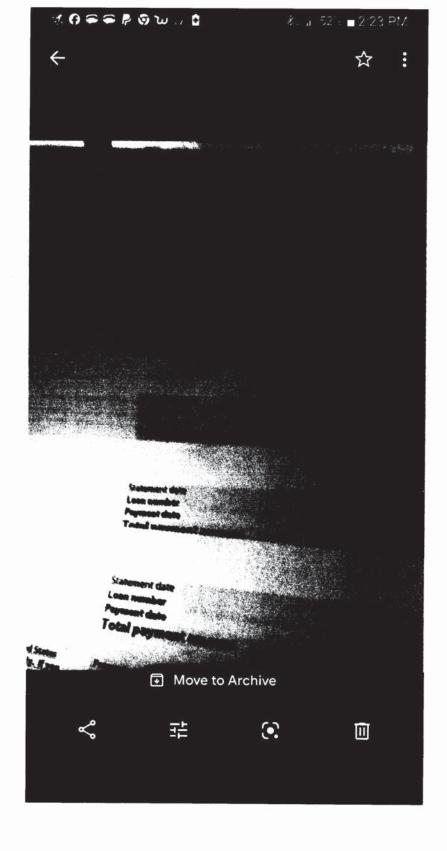
IF YOU FAIL TO RESPOND TO THIS SUMMONS, YOUR FAILURE WILL BE DEEMED TO BE YOUR CONSENT TO ENTRY OF A JUDGMENT BY THE BANKRUPTCY COURT AND JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

	-	(Clerk of the Bankruptcy Court)
Date: 01/05/2021	Ву:	(Deputy Clerk)

## CERTIFICATE OF SERVICE

	ussel P. Blust Sr. (name), certify that service of this summons and a copy of nt was made January 05, 2021 (date) by:
	Mail service: Regular, first class United States mail, postage fully pre-paid, addressed to:
	Personal Service: By leaving the process with the defendant or with an officer or agent of defendant at:
	Residence Service: By leaving the process with the following adult at:
⊠	Certified Mail Service on an Insured Depository Institution: By sending the process by certified mail addressed to the following officer of the defendant at:  Wells Fargo Home Mortgage PO BOX 10368 Des Moines, IA 50306 Specialized Loan Services LLC. 8742 Lucent BLVD Suite 300 Highlands Ranch, CO 80129 Highlands Ranch, CO 80129 Specialized Company PO BOX 5106 Springfold ON 45501
	Publication: The defendant was served as follows: [Describe briefly]
٥	State Law: The defendant was served pursuant to the laws of the State of, as follows: [Describe briefly]
certify that I a	rice was made by personal service, by residence service, or pursuant to state law, I further am, and at all times during the service of process was, not less than 18 years of age and the matter concerning which service of process was made.
Under	penalty of perjury, I declare that the foregoing is true and correct.
Date t	Print Name:
	Business Address:

& R



Return Mail Operations PO Box 14411 Des Moines IA 50306-3411



Statement date
Loan number
Payment date
Total payment amount

11/13/19 0534164322 12/01/19 \$19,174.47

If you are in an active bankruptcy case or have received a discharge under the United States Bankruptcy Code, this statement is being sent to you for informational purposes only. If you want to stop receiving statements, please write to us at the correspondence address listed on the statement.

DCSF1CDTLS 012142DCSF1C00000015402708

## 

\*

1334 VERNON ST HARRISBURG, PA 17104-1178 Property address

1334 VERNON STREET HARRISBURG, PA 17104

## Customer Service

Online wellsfargo,com/ym

Telephone\* 1-800-274-7025

Correspondence PO Box 10335 Des Moines IA 50306 Fax 1-866-278-1179

Po Box 14507 Des Mornes IA 50306 Hours of operation Mon - Fri 7 a.m. - 7 p.m. CT

We accept telecommunications relay service calls.

Explanation of payment amount (Post-petition payment)		Account summary		Past payments breakdown			
		Unpaid principal balance	\$14,957.64		Since last statement	Year-to-date	
Principal	5470.81	(This is not a payoff amount.)		Total received*	\$0.00	\$5,908.62	
Interest	\$21.16	Unpaid advance balance	\$7,080.20	Principal	\$416.70	\$4,473.66	
Escrow		Unapplied funds balance	\$2,290.37	Interest**	\$75.27	\$938.01	
Current payment 2 12/01/19	\$273.98 \$765.95	Escrow balance	-\$434.74	Escrow	\$311.34	\$496.95	
Unpaid payment 12/01/17-11/01/19	\$18,408.52			Taxes disbursed (YTD)		£1 0F6 B3	
Total payment amount 2	\$19,174.47	Interest rate	5.875%	Insurance disbursed (YTD)		\$1,956.83 \$1,349.20	
<sup>2</sup> The information in this section reflects post-petition		Maturity date (month/year)	08/20				
payment amounts under the bankruptcy	plan.			"This total may include the Unapplie "This information should not be use please consult your tax advisor.	of funds balance from the Accounted for tax purposes. If you have to	t summary section. x related questions,	

## Informational messages

We have not received all of the payments that have come due since the filing of the bankruptcy case.

If the bankruptcy plan requires you to make post-petition payments directly to the trustee do not send payments to us. Instead, send the payments to the trustee.

This statement may not show recent payments sent to the trustee that the trustee has not yet forwarded to us. Please contact your attorney or the trustee if you have questions.

If there is a trial plan for a loan modification, the Explanation of payment amount will continue to reflect the post-petition payment amount until the loan has been permanently modified.

If a debtor in a bankruptcy case is attempting to cramdown or modify the mortgage lien, the amounts on the statement will continue to reflect the post-petition amounts until the bankruptcy court enters a final order and any system adjustments are completed. Once system adjustments have been completed, the amounts on the statement, such as amounts in the Explanation of payment amount and Account summary sections, will reflect the terms of the final order. This may take up to two billing cycles following the entry of a final order.

If a debtor in a bankruptcy case is attempting to remove or strip the mortgage lien as part of a bankruptcy case, the amounts on the statement will continue to reflect the post-petition amounts until the discharge order is entered.

### Activity since your last statement

Date Description	Total	Principal	Interest	Escrow	Other
11/04 Payment		\$416.70	\$75.27	\$311.34	Unapplied -\$803.31

## Important messages

This loan has an unpaid advance balance of \$7,080.20; this is a result of funds paid on your behalf. Types of advances include but are not limited to taxes, insurance, utility payments, and attorney fees. If the loan has been released from bankruptcy or court approval has been obtained in order to proceed with state law remedies, any unpaid advance balance may be due in full in order to reinstate the loan. If you have questions or would like to make a payment, call us at the number listed above or send additional funds with the next mortgage payment to be applied to the advance balance.

RUSSEL P BLUST			• • • •	 	ontinued on next page additional funds
1334 VERNON ST HARRISBURG, PA 17104	Loan number 0534164322 Payment date 12/01/19	Payment x pmt amt	A	\$	
	If the bankruptcy plan requires you to make post-petition payments directly to the bankruptcy trustee do not send payments to us.	Additional principal	В	\$	•
Check here and see reverse for address correction,	Instead, send the payments to the trustee,	Late charges	с	\$	•
կովորիսկլկորդիրույից	լորհովիրակիցը <b>մ</b>	Other charges	D	\$	•
WELLS FARGO HOME MOI PO BOX 14507 DES MOINES IA 50306-	RTGAGE	Additional escrow (if applicable)	Ε	\$	•
		mount enclosed F	\$		(*)

DCSF1CDTLQ 018798

NNN NNN NNNNNNNN

100 002

Return Mail Operations PO Box 14411 Des Moines IA 50306-3411

AZ

Statement date Loan number Payment date Total payment amount

11/12/19 0534164322 12/01/19 \$19,977.78

If you are in an active bankruptcy case or have received a discharge under the United States Bankruptcy Code, this statement is being sent to you for informational purposes only. If you want to stop receiving statements, please write to us at the correspondence address listed on the

DCSF1CDTLQ 018798DCSF1C00000024762708 լիվուրդեփմիկիկիկիրիվորեսնվրկյներյելինը RUSSEL P BLUST

1334 VERNON ST HARRISBURG, PA 17104-1178 Property address

1334 VERNON STREET HARRISBURG, PA 17104

#### **Customer Service**

12	Online	
(0)	Online wellsfargo.com/ym	

Telephone' 1-800-274-7025

Correspondence PO Hox 10335 Des Moines IA 50306 1-866-278-1179

Payments PO Box 14507 Des Moines IA 50306 Hours of operation Mon - Fr! 7 a.m. - 7 p.m. CT

Explanation of payment amount (Post-petition payment)		Account summary		Past payments breakdown			
		Unpaid principal balance	\$15,374.34		Since last statement	Year-to-date	
Principal	\$470.81	(This is not a payoff amount.)		Total received*	\$747.41	\$5,105.31	
		Unpaid advance balance	\$7,080.20	Principal	\$414.67	\$4,056.96	
Interest	\$21.16	Unapplied funds balance	\$3,093.68	Interest**	\$77.30	5862.74	
Escrow	\$273.98	Escrow balance	-\$746.08	Escrow	-\$2,616.45	\$185.61	
Current payment 212/01/19	\$765.95		47 10.00	CICION	-72,010,45	2103.01	
Unpaid payment 11/01/17-11/01/19	\$19,211.83	·		Taxes disbursed (YTD)		\$1,956.83	
Total payment amount 2	\$19,977.78	Interest rate	5.875%	Insurance disbursed (	(TD)	\$1,349.20	
		Maturity date (month/year)	08/20				
<sup>2</sup> The information in this section reflects post-petition payment amounts under the bankruptcy plan.					applied funds balance from the Accour- be used for tax purposes. If you have to r <sub>ef</sub>		

payment amounts under the bankruptcy plan Informational messages

We have not received all of the payments that have come due since the filing of the bankruptcy case.

If the bankruptcy plan requires you to make post-petition payments directly to the trustee do not send payments to us. Instead, send the payments to the trustee.

This statement may not show recent payments sent to the trustee that the trustee has not yet forwarded to us. Please contact your attorney or the trustee if you

If there is a trial plan for a loan modification, the Explanation of payment amount will continue to reflect the post-petition payment amount until the loan has been permanently modified.

If a debtor in a bankruptcy case is attempting to cramdown or modify the mortgage lien, the amounts on the statement will continue to reflect the post-petition amounts until the bankruptcy court enters a final order and any system adjustments are completed. Once system adjustments have been completed, the amounts on the statement, such as amounts in the Explanation of payment amount and Account summary sections, will reflect the terms of the final order. This may take up to two billing cycles following the entry of a final order.

If a debtor in a bankruptcy case is attempting to remove or strip the mortgage lien as part of a bankruptcy case, the amounts on the statement will continue to reflect the post-petition amounts until the discharge order is entered.

#### Activity since your last statement

Date	Description	Total	Principal	Interest	Escrow	Other
11/04	Payment		\$414.67	\$77.30	\$311.34	Unapplied -\$803.31
11/04	Payment reversal				-\$2,927.79	Unapplied \$2,927.79
10/15	Funds Received	\$747.41				Unapplied \$747.41

## Important messages

RUSSEL P BLUST

1334 VERNON ST

HARRISBURG, PA 17104

Check here and see reverse for address

This loan has an unpaid advance balance of \$7,080.20; this is a result of funds paid on your behalf. Types of advances include but are not limited to taxes, insurance, utility payments, and attorney fees. If the loan has been released from bankruptcy or court approval has been obtained in order to proceed with state law remedies, any unpaid advance balance may be due in full in order to reinstate the loan. If you have questions or would like to make a payment, call us at the number listed above or send additional funds with the next mortgage payment to be applied to the advance balance.

Loan number

0534164322

Payment date 12/01/19

If the bankruptcy plan requires you to make post-petition payments directly to the bankruptcy trustee do not send payments to us. Instead, send the payments to the trustee.

		 Please specia	fy additional	
Payment x pmt amt	A	\$ 		•
Additional principal	В	\$		
Late charges	c	\$		
Other charges		\$		•
Additional escrow (if applicable)	E	\$		

Ուկալուգուսագրիլովինումինիայիցունինիայիցումի

WELLS FARGO HOME MORTGAGE PO BOX 14507 DES MOINES IA 50306-3507

ExaRT B

Carissa Lehr 2536 Rolo Ct. Mechanicsburg, Pa 17055

Re: Russel P. Blust Bankruptcy Case Chapter 13 Bankruptcy Case # 1-15-02826

To whom it may concern,

I Carissa Lehr lived at 1334 Vernon St. Harrisburg, Pa 17104 during May 2014-Nov. 2016. During this time frame I have seen numerous mortgage inspectors at the property walking around. On one occasion specifically I remember a neighbor that rented from down the street actually pulled a gun on one of the inspectors and asked him "what the hell are you doing here?." In which the inspector responded "the property is in foreclosure and he's going to lose the property." They would come out literally I recall one month they were out on three separate occasions in the same month. One other instance I recall is when I spoke to one of the mortgage inspectors and he told me directly that I didn't need to pay my rent because he was going to lose the building. I certify that everything in this letter is true and correct. I would absolutely be willing to testify to this in court under oath.

Thank you, Respectfully Submitted,

Desc